

THE
ROTH LAW FIRM
PLLC

May 4, 2023

VIA ECF

The Honorable John G. Koeltl
United States District Court
Southern District of New York
500 Pearl Street, 14A
New York, NY 10007-1312

**Re: *Kunstler, Hrbek, Goetz and Glass v. The Central Intelligence Agency,
Pompeo, Morales and Undercover Global S.L., 22 Cv. 6913***

Dear Judge Koeltl:

We respectfully represent plaintiffs Kunstler, Hrbek, Goetz and Glass (collectively, “Plaintiffs”) to request a 30-day extension of time for Plaintiffs’ oppose the motion to dismiss filed by defendants Central Intelligence Agency (“CIA”) and Michael R. Pompeo (“Pompeo”) (collectively, “Federal Defendants”) in the above-captioned matter. Plaintiffs’ opposition is currently due on Monday, May 8, 2023. The Federal Defendants consent to Plaintiffs’ request and similarly request that they receive a reciprocal 30-day extension for their reply brief.

The Court previously extended the briefing schedule such that the Federal Defendants’ opening brief was pushed back from February 17, 2023 to March 20, 2023, Plaintiffs’ opposition to May 8, 2023 and Defendants’ reply brief to May 30, 2023. The additional time is requested by Plaintiffs because Plaintiffs’ counsel were traveling and on trial in April.

We thank the Court for its consideration of this request.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'R. Roth', with a stylized flourish extending to the right.

Richard A. Roth, Esq.